



One Lincoln Center | Syracuse, NY 13202-1355 | [bsk.com](http://bsk.com)

**KRISTEN E. SMITH, ESQ.**

[ksmith@bsk.com](mailto:ksmith@bsk.com)

P: 315.218.8090

F: 315.218.8100

February 2, 2023

**VIA CM/ECF ELECTRONIC FILING**

Hon. Thérèse Wiley Dancks  
U.S. Magistrate Judge  
U.S. District Court, Northern District of New York  
Federal Building and U.S. Courthouse  
100 South Clinton Street  
Syracuse, NY 13261

Re: *Beauchine v. City of Syracuse, New York, et al.*  
*Civil Case No.: 5:21-cv-00845 (BKS-TWD)*

Dear Magistrate Judge Dancks:

As the Court is aware, this firm represents the Defendants in the above-referenced case. I write to request a one-month extension of the existing discovery deadline, from February 28, 2023 until March 31, 2023, to allow the parties to complete depositions in this case. This would, in turn, reset the remaining deadlines ahead by one month.

The parties have worked diligently over the last month to narrow any issues concerning discovery disputes and are in the process of scheduling depositions. Please note that Plaintiff consents to this extension request.

We appreciate the Court's time and attention in this matter.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

A handwritten signature in black ink, appearing to read "K E Smith", written over a light blue horizontal line.

Kristen E. Smith, Esq.

KES/clb

cc: A.J. Bosman, Esq. (via CM/ECF)  
Robert J. Strum, Esq. (via CM/ECF)